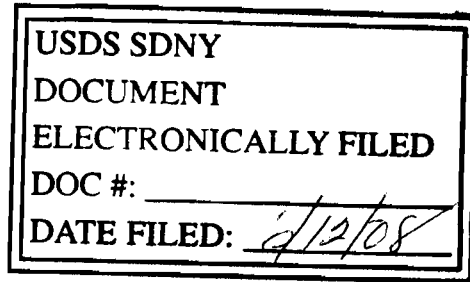


**Holland Knight**

Tel 212 513 3200  
Fax 212 385 9010

Holland & Knight LLP  
195 Broadway, 24th Floor  
New York, NY 10007-3189  
www.hklaw.com

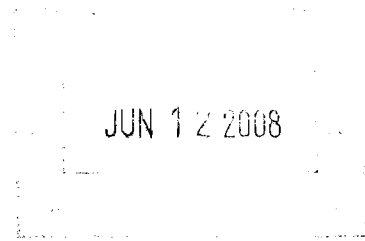
June 11, 2008



Michael J. Frevola  
212 513 3516  
michael.frevola@hklaw.com

**BY HAND**

The Honorable John G. Koeltl  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Room 1030  
New York, New York 10007



Tasfiye Halinde Ahu Trans Denizcilik ve Ticaret Ltd. Şti. v. Nateus Verzekeringen  
SDNY Docket #: 08 Civ. 2511 (JGK)  
Our File: 116099-00001

Honorable Sir:

We are counsel for plaintiff Tasfiye Halinde Ahu Trans Denizcilik ve Ticaret Ltd. Şti. ("Tasfiye") in the referenced matter.

We are writing in connection with Tasfiye's request to file a Verified Second Amended Complaint, as well as for a Second Amended Order of Maritime Attachment which reflects the added names sought to be added in the Verified Second Amended Complaint. As Rule 15(a) requires that a party may amend its pleadings only by leave of court after having once filed an amended pleading, we write to request such leave. As the defendant has not appeared to date, in the interest of reducing the burden on the Court we have made our application by letter.

It is well-settled that amendments under Rule 15(a) should be liberally granted when the movant shows good cause for the proposed amendment. Plaintiff's proposed Verified Second Amended Complaint is identical to its Verified Amended Complaint with the exception of adding several permutations on the name of the defendant, Nateus Verzekeringen. We have learned that funds paid to the defendant have passed through New York and, from inquiry with the garnishees, it is because the defendant does not use "Nateus Verzekeringen" as its official name. Upon inquiry

2 - The Honorable John G. Koeltl  
April 11, 2008

with overseas counsel, it appears that Nateus Verzekeringen is Flemish for "Nateus Insurance," but the official name is "Nateus NV." To compound the confusion, because Belgium uses *both* Flemish and French as its official languages, the French version of the defendant's name is "Nateus Assurances" and "Nateus SA." For Your Honor's ease of reference, we have attached pages from the defendant's website with the referenced designations which shows these official designations.

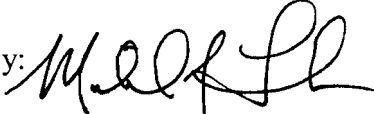
In essence, Plaintiff's request to amend merely seeks to add additional names by which the defendant is known. Plaintiff respectfully submits that good cause exists for such a administrative amendment. We have enclosed the proposed Second Amended Verified Complaint, our Affidavit in Support of the Second Amended Order of Attachment, and the Second Amended Order of Attachment for Your Honor's reference.

We are grateful for Your Honor's consideration of Plaintiff's application, and we look forward to receiving Your Honor's decision in due course. For the ease of the Court, we have provided a "So Ordered" line below for Your Honor's endorsement in the event that the application is granted.

Respectfully submitted,

HOLLAND & KNIGHT LLP

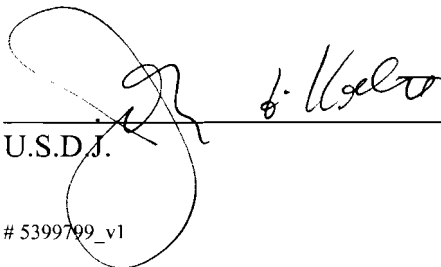
By:



Michael J. Frevola

MJF/mf  
Encs.

**SO ORDERED:**



U.S.D.J.

Date

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